IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION No. 5:07-CV-426-H

ADVANCED INTERNET TECHNOLOGIES, INC.,)))
Plaintiff,) MOTION TO INTERVENE BY THE
v.	NEW YORK TIMES COMPANY
DELL, INC. and DELL FINANCIAL SERVICES, INC.,)))
Defendants.))

The New York Times Company, by and through counsel, and pursuant to Federal Rules of Civil Procedure 24(a) and 24(b), respectfully moves the Court to enter an order allowing it to intervene in this case for the limited purpose of asserting and protecting its and the people's right of access to judicial documents, as conferred by the First Amendment to the Constitution of the United States and the common law.

The grounds for this Motion are set forth in the accompanying Memorandum of Law. Pursuant to Rule 24(c), the Times has filed contemporaneously with this Motion its Proposed Opposition to the Parties' Motions to Seal.

WHEREFORE, the New York Times Company respectfully requests that this Court enter an Order granting the New York Times Company's Motion to intervene in this case under Fed. R. Civ. P. 24.

Respectfully submitted, this the 14th day of July 2010.

/s/ Eric M. David

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ADVANCED INTERNET TECHNOLOGIES, INC.,)))
Plaintiff,	CERTIFICATE OF SERVICE
v.) CERTIFICATE OF SERVICE
DELL, INC. and DELL FINANCIAL SERVICES, INC.,)))
Defendants.))

I hereby certify that I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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This the 14th day of July 2010.

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